

From: [Chip Humphrey](#)
To: [Bill Locke](#); [jim.mckenna@portofportland.com](#); [ricka@bes.ci.portland.or.us](#); [rjw@nwnatural.com](#)
Cc: [Christine Hawley](#); [Eric Blischke](#); [Keith Pine](#); [voster@anchorenv.com](#)
Subject: Re: Extension Request: R2 Groundwater Pathway Summary Report
Date: 07/21/2006 03:57 PM

Bill, Jim, Rick and Bob,

EPA will accept the LWGs revised date of August 7, 2006 for submittal of the R2 Groundwater Pathway Assessment Site Characterization Summary Report. We are disappointed by the additional delay of this report and that we won't be able to preview the results of the Assessment Summary prior to our meeting that is currently scheduled for June 26th. Some of our project team have questioned the value of the meeting if they are unable to get an advance look at and have some familiarity with the report. I don't want to postpone the meeting at this point, but our team would like to see the presentation materials in advance so we can hopefully have more productive discussions. The presentation materials and your detailed proposed agenda will also help us sort out who should attend the meeting. One of the biggest questions for meeting attendance is how much discussion there will be on the outstanding issues (as well as a common understanding what the issues are) regarding evaluation of Transition Zone water data in the draft human health and ecological risk evaluations for the Round 2 Report.

thanks,
Chip Humphrey

▼ [Bill Locke <wlocke@integral-corp.com>](#)

Bill Locke
<wlocke@integral-
corp.com>

07/18/2006 01:41 PM

To: Chip Humphrey/R10/USEPA/US@EPA, Eric Blischke/R10/USEPA/US@EPA
cc: rjw@nwnatural.com, jim.mckenna@portofportland.com, ricka@bes.ci.portland.or.us, voster@anchorenv.com, Keith Pine <kpine@integral-corp.com>, Christine Hawley <chawley@integral-corp.com>
Subject: Extension Request: R2 Groundwater Pathway Summary Report

Dear Chip and Eric:

On behalf of the LWG, this email follows up on the EPA-LWG managers' conference call earlier today, during which the LWG requested an extension in the submittal date for the Round 2 Groundwater Pathway Assessment Site Characterization Summary Report. The proposed new

submittal date for this report is August 7, 2006.

Several factors have contributed to our need for an extension. First, we have been working diligently to develop data presentation tools (e.g., maps, data summaries, etc.) that will portray the results of both the discharge mapping and transition zone water sampling as clearly and efficiently as possible. This effort is intended to facilitate agency review and foster a transparent understanding of the large volume of physical and chemical data generated during the Round 2 groundwater pathway field investigation. Data reduction and development of these presentation tools has taken somewhat longer than we originally anticipated.

Second, the LWG and EPA reached agreement on the selection and application of ecological and human health screening values for transition zone water only within the last few weeks. While a formal risk-based screening of the Round 2 transition zone water data will not be presented in the Round 2 Groundwater Pathway SCSR, these values, and the exposure pathway assumptions they represent, are relevant for the overall assessment and interpretation of the transition zone water dataset. In light of these recent clarifications on the future use of transition zone data in the risk assessments, our technical team needs additional time to revise some aspects of the data presentation and interpretation approach in the Groundwater Pathway SCSR.

Finally, the LWG and EPA have been attempting to schedule a meeting to discuss the Round 2 transition zone water sampling results since shortly after our last groundwater meeting on May 16. This meeting was envisioned in part as an opportunity to with the agency team in advance of the report submittal date. We previously proposed to meet on June 13 and later on July 6, but we were unable to schedule these dates because of the unavailability of some key agency personnel. The meeting has now been scheduled for July 26. While we have made substantial progress on the report in the interim, the difficulties in scheduling a meeting to share our initial findings from the transition zone water dataset and discuss other related issues have contributed to the delay in completing the SCSR.

We are looking forward to our groundwater pathway meeting with you on July 26. We believe the focus of this meeting should be threefold: (1) an introduction to the Round 2 transition zone water results, (2) potential Round 3 data needs associated with the four additional sites identified by the agencies for possible transition zone water sampling, and (3) outstanding issues regarding the evaluation of transition zone water data in the draft human health and ecological risk evaluations for the Round 2

Comprehensive Summary Report. I will follow up later this week with a detailed proposed agenda.

Regards,

Bill Locke, P.E., Principal
Integral Consulting Inc.
12303 Airport Way, Suite 307
Broomfield, Colorado 80021

tel. 303.404.2944 ext. 15
fax 303.404.2945
www.integral-corp.com

This electronic message may contain information that is confidential and/or privileged work product prepared in anticipation of litigation. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, please be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify us by telephone at (303) 404-2944 ext. 15, or by electronic mail at wlocke@integral-corp.com.